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*Attorneys for Plaintiff Nevada Resort Association-
International Alliance of Theatrical Stage Employees
and Moving Picture Machine Operators of the United
States and Canada Local 720 Pension Trust*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NEVADA RESORT ASSOCIATION –
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA LOCAL 720 PENSION
TRUST,

Plaintiff,

vs.

JB VIVA VEGAS, L.P.,

Defendant.

JB VIVA VEGAS, L.P.,

Counterclaimant,

vs.

CASE NO.: 2:19-cv-00499-JAD-CWH

**PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER SUBMITTED IN
COMPLIANCE WITH FRCP 26(F)(3) AND LR
26-1**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

1 NEVADA RESORT ASSOCIATION –
2 INTERNATIONAL ALLIANCE OF
3 THEATRICAL STAGE EMPLOYEES
4 AND MOVING PICTURE MACHINE
5 OPERATORS OF THE UNITED STATES
6 AND CANADA LOCAL 720 PENSION
7 TRUST,

Counterdefendant.

8 Pursuant to Federal Rule of Civil Procedure 26(f)(3) and Local Rule 26-1, Plaintiff
9 Nevada Resort Association-International Alliance of Theatrical Stage Employees and Moving
10 Picture Machine Operators of the United States and Canada Local 720 Pension Trust (“Plaintiff”)
11 by and through their attorneys of record at Brownstein Hyatt Farber Schreck, LLP, and Defendant
12 JB Viva Vegas, L.P.’s (“Defendant”) hereby submit the following special discovery plan and
13 scheduling order.

14 This matter is an action for judicial review of an arbitration award related to a withdrawal
15 liability dispute pursuant to Multiemployer Pension Plan Amendments Act of 1980, and
16 specifically 29 U.S.C. § 1401(b)(2). The parties’ counsel conferred on June 24, 2019, pursuant to
17 Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(a), and agreed that the only deadlines
18 needed in this case were dispositive motion deadlines. The parties also met and conferred about
19 the settlement possibilities, but unfortunately resolution was not achieved.

20 The parties therefore agreed on the following briefing schedule:

- 21 1. The parties shall have until Monday, August 26, 2019, to file dispositive motions.
- 22 2. The parties shall have until Monday, September 16, 2019, to file oppositions to
23 dispositive motions.

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3. The parties shall have until Monday, September 30, 2019, to file replies in support of dispositive motions.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

AKIN GUMP STRAUSS HAUER & FELD,
LLP

/s/ Christopher M. Humes

/s/ Eric Field

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Attorneys for Plaintiffs

Attorneys for Defendant

Dated: July 8, 2019.

Dated: July 8, 2019.

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT/MAGISTRATE JUDGE

DATED: July 11, 2019

CASE NO. 2:19-cv-00499-JAD-CWH